

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

JULIANN APELT a/k/a  
JULIANN O'BRIEN, a/k/a  
JULIANN KOWALKO

Debtor

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CHAPTER 13

CASE NO: 15-12313SR

**NOTICE OF DEBTOR'S MOTION PURSUANT TO 11 U.S.C. §1329(a)  
TO MODIFY PLAN POST-CONFIRMATION**

The Debtor has filed the above-titled Motion.

**You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **September 9, 2016, (09/09/2016)** you or your attorney must do all of the following:

- a. file an answer explaining your position at:

United States Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

- b. mail, fax, or e-mail a copy to the movant's attorney:

ALFONSO MADRID, ESQ.  
757 South 8<sup>th</sup> St.  
Philadelphia PA 19147  
[alfonsomadrid.esq@gmail.com](mailto:alfonsomadrid.esq@gmail.com)  
(215) 402-3437 (fax)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b)

above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable **Stephen Raslavich on September 28, 2016 (09/28/2016) at 10:00 AM in Courtroom 4**, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to the disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b)
5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.